

July 9, 2019

Project No. 30403333

U.S. Environmental Protection Agency
Regional Freedom of Information Officer
U.S. EPA, Region 6
1201 Elm Street, Suite 500, (6MD-OE)
Dallas, TX 75270

RE: FREEDOM OF INFORMATION ACTION (FOIA) REQUEST

To Whom it May Concern:

This email is a Freedom of Information Action (FOIA) request (5 U.S.C §. 552) for records.

This request pertains to documentation concerning the technical impracticability (TI) demonstration and waiver granted by the United States Environmental Protection Agency relating to groundwater concentrations of arsenic at the Crystal Chemical Company Superfund Site.

This FOIA request includes the following reports/documentation, which are included in the Administrative Record Index on the attached document "Explanation of Significant Difference for the Record of Decision: Crystal Chemical Co., Houston, TX March 19, 1997":

- Industrial Compliance. "Geochemical/Geohydrologic Report – Groundwater Remedial Design." July 2, 2004.
- Southern Pacific Lines. "Treatment of Arsenic Groundwater from the Crystal Chemical Superfund Site." August 17, 1994.
- Industrial Compliance. "Revised Work Plan for Technical Evaluation of Arsenic Extraction." September 28, 1994.
- Hydrologic Consultants Inc. "Soil and Groundwater Model Report." March 20, 1995.
- Hydrologic Consultants Inc. "Treated Groundwater Reinjection Option Report." March 30, 1995.
- Texas Natural Resources Conservation Commission (TNRCC). Letter RE: TNRCC comments about Southern Pacific Transportation Company's groundwater technical impracticability (TI) water for potion of remedy presented in "Assessment of the TI Groundwater Remediation Report." April 20, 1995.
- United States Environmental Protection Agency (EPA). "EPA's Comments on the TI Groundwater Remediation Report." April 28, 1995.
- Vinson & Elkins. Letter to EPA Remedial Project Manager (RPM) RE: TI waiver and public notice requirements. May 18, 1995.
- EPA Region 6. Letter to Vinson & Elkins RE: Response to Mr. Amandes' 5/18/95 letter. May 30, 1995.

- Vinson & Elkins. Letter to EPA RPM RE: Requests EPA reconsider submitting decision granting Southern Pacific Lines at TI waiver for groundwater remedy.
- EPA Region 6. Letter to Vinson & Elkins RE: 1) EPA grants TI waiver for groundwater remedy and 2) EPA requests access to property to perform response action for contaminated groundwater. August 30, 1995.
- Texas Natural Resources Conservation Commission (TNRCC). Letter to EPA RE: TNRCC's agreement with TI waiver and with the slurry wall. September 28, 1995.
- EPA (Ada, Oklahoma). Letter to EPA Remedial Project Manager RE: Review comments on "Geochemical/Geohydrologic Report, Volume 1", (7/22/94) and "Assessment of the TI of Groundwater Remediation, Volume 1" (95-R06-001). October 2, 1995.
- EPA Headquarters. Memorandum to EPA Remedial Project Manager RE: Review of the "TI of Groundwater Remediation Report." October 26, 1995.
- Hydrologic Consultants, Inc. "Assessment of the TI of Groundwater Remediation." February 2, 1996.

To assist with fee assessment, Golder is seeking this information to be used for the company's business. We are willing to pay applicable fees related to the search, review and duplication of records. Please provide a cost estimate if fees exceed \$250. We request electronic copies of the records.

Please feel free to contact me at (832) 916-3692 if you have any questions.

Sincerely,

Golder Associates Inc.



Roberta Russell, P.G.
Senior Project Geologist

Attachment